

1 JOHN M. APPELBAUM  
Chief of Enforcement  
2 GALENA WEST  
Commission Counsel  
3 FAIR POLITICAL PRACTICES COMMISSION  
428 J Street, Suite 620  
4 Sacramento, CA 95814  
Telephone: (916) 322-5660  
5 Attorneys for Complainant  
6

7 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION  
8 STATE OF CALIFORNIA  
9

10 In the Matter of	)	FPPC No.: 03/107
	)	
11	)	
12 PAUL V. GALLEGOS, PAUL V. GALLEGOS	)	STIPULATION, DECISION and
FOR DISTRICT ATTORNEY, AND	)	ORDER
13 STEPHEN P. ARNOT,	)	
	)	
14	)	
Respondents.	)	
15	)	
	)	

16  
17 Complainant Mark Krausse, Executive Director of the Fair Political Practices Commission, and  
18 Respondents Paul V. Gallegos, Paul V. Gallegos for District Attorney, and Stephen P. Arnot hereby  
19 agree that this stipulation will be submitted for consideration by the Fair Political Practices Commission  
20 at its next regularly scheduled meeting.

21 The parties agree to enter into this stipulation to resolve all factual and legal issues raised by this  
22 matter and to reach a final disposition without the necessity of holding an administrative hearing to  
23 determine the liability of Respondents.

24 Respondents understand, and hereby knowingly and voluntarily waive, any and all procedural  
25 rights set forth in sections 83115.5, 11503, and 11523 of the Government Code, and in section 18361 of  
26 title 2 of the California Code of Regulations. This includes, but is not limited to, the right to personally  
27 appear at any administrative hearing held in this matter, to be represented by an attorney at  
28 Respondents' own expense, to confront and cross-examine all witnesses testifying at the hearing, to

1 subpoena witnesses to testify at the hearing, to have an impartial administrative law judge preside over  
2 the hearing as a hearing officer, and to have the matter judicially reviewed.

3 It is further stipulated and agreed that Respondents Paul V. Gallegos, Paul V. Gallegos for  
4 District Attorney, and Stephen P. Arnot violated the Political Reform Act by failing to disclose a \$2,500  
5 late contribution in a properly filed late contribution report, in violation of section 84203, subdivision (a)  
6 of the Government Code (1 count); failing to disclose occupation and employer information for  
7 contributions of \$100 or more, in violation of section 84211, subdivision (f) of the Government Code  
8 (2 counts); failing to return contributions totaling \$6,835 within 60 days of receipt for which they did not  
9 have occupation and employer information, in violation of section 85700 of the Government Code  
10 (2 counts); and failing to timely file a post-election semi-annual campaign statement, in violation of  
11 section 84200, subdivision (a) of the Government Code (1 count), as described in Exhibit 1. Exhibit 1 is  
12 attached hereto and incorporated by reference as though fully set forth herein. Exhibit 1 is a true and  
13 accurate summary of the facts in this matter.

14 Respondents agree to the issuance of the decision and order, which is attached hereto.  
15 Respondents also agree to the Commission imposing upon them an administrative penalty in the amount  
16 of Ten Thousand Dollars (\$10,000). A cashier's check from Respondents in said amount, made payable  
17 to the "General Fund of the State of California," is submitted with this stipulation as full payment of the  
18 administrative penalty, and shall be held by the State of California until the Commission issues its  
19 decision and order regarding this matter. The parties agree that in the event the Commission refuses to  
20 accept this stipulation, it shall become null and void, and within fifteen (15) business days after the  
21 Commission meeting at which the stipulation is rejected, all payments tendered by Respondents in  
22 connection with this stipulation shall be reimbursed to Respondents. Respondents further stipulate and  
23 agree that in the event the Commission rejects the stipulation and a full evidentiary hearing before the  
24 Commission becomes necessary, neither any member of the Commission, nor the Executive Director,  
25 shall be disqualified because of prior consideration of this stipulation.

26 Dated: \_\_\_\_\_

27 \_\_\_\_\_  
28 Mark Krausse, Executive Director  
Fair Political Practices Commission

1 Dated: \_\_\_\_\_

2 \_\_\_\_\_  
Paul V. Gallegos, Respondent

3  
4 Dated: \_\_\_\_\_

5 \_\_\_\_\_  
Stephen P. Arnot, individually and on behalf of Paul V.  
6 Gallegos for District Attorney, Respondents

7 **DECISION AND ORDER**

8 The foregoing stipulation of the parties “In the Matter of Paul V. Gallegos, Paul V. Gallegos for  
9 District Attorney and Stephen P. Arnot, FPPC No. 03/107,” including all attached exhibits, is hereby  
10 accepted as the final decision and order of the Fair Political Practices Commission, effective upon  
11 execution below by the Chairman.

12  
13 IT IS SO ORDERED.

14  
15  
16 Dated: \_\_\_\_\_

17 \_\_\_\_\_  
Liane M. Randolph, Chairman  
Fair Political Practices Commission